

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA

CRIMINAL NO. 20-20382

vs.

HON. PAUL D. BORMAN

DENNIS WILLIAMS,

Defendant.

NOTICE OF EXHIBIT FOR SENTENCING

Through this filing, the government provides notice to the Court and the Defendant of its intent to rely on the attached Exhibit at sentencing.

In his sentencing memorandum, Williams asked the Court to consider as “the most concrete example of [his] true priorities, [that] he chose to forego substantial personal compensation associated with sitting on corporate boards.” (ECF No. 25, PageID.239).

Under UAW’s ethics rules, however, Williams was *prohibited* from accepting “personal compensation” over \$1,500 per year from third-party employment, including service on a board of directors. (Ex. 1: UAW Policy on Outside Remuneration, 9/12/06, p.2). Any compensation beyond this amount was required to go either to the UAW or a charity. (*Id.*). And the policy “cover[ed] all

. . . types of potential compensation, regardless of whether such compensation would be received before or after the Staff member's retirement." (*Id.*, p.3).

Respectfully submitted,

SAIMA S. MOHSIN
Acting United States Attorney

s/Steven P. Cares
STEVEN P. CARES
Assistant U.S. Attorney
211 W. Fort Street, Suite 2001
Detroit, MI 48226
steven.cares@usdoj.gov
(313) 226-9139

s/David A. Gardey (w/ consent)
DAVID A. GARDEY
Assistant U.S. Attorney
211 W. Fort Street, Suite 2001
Detroit, MI 48226
david.gardey@usdoj.gov
(313) 226-9591

CERTIFICATION OF SERVICE

I hereby certify that on **May 7, 2021**, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all attorneys of record.

s/Steven P. Cares (P68503)

Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, Michigan 48226
Phone: (313) 226-9139
E-mail: steven.cares@usdoj.gov